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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PARNELL COLVIN,)	CASE NO. 2:20-cv-01765-APG-EJY
)	
Plaintiff,)	PLAINTIFF'S PROPOSED VOIR DIRE
)	QUESTIONS
vs.)	
)	
M.J. DEAN CONSTRUCTION, INC.,)	
)	
Defendant.)	
)	Trial: March 27, 2023
)	Time: 9:00 a.m.
)	Judge: Honorable Andrew Gordon

Plaintiff PARNELL COLVIN ("Plaintiff" or "Colvin") submits his proposed voir dire questions to be posed to prospective jurors at the time of jury selection as follows:

1. Do you feel it is wrong for an individual to file a lawsuit to enforce their legal rights. If so please explain.
2. Have you ever filed a lawsuit to enforce you legal rights? If so please explain.
3. What are your views when a non-African American calls an African American the N-word?

- 1 4. Does your view change if an African American calls another African American the
- 2 N-word? If so, why?
- 3 5. Do you feel there is any use for the n-word in today's society? If yes, please
- 4 explain.
- 5 6. Have you ever been called a racist? If so please explain.
- 6 7. Do you think you are a racist? If so please explain.
- 7 8. Do you think former President Donald Trump is racist? If so please explain.
- 8 9. Do you think former President Donald Trump has used racist language or said
- 9 racist things in the past? If so please explain.
- 10 10. Do you agree with any of the language that former President Donald Trump has
- 11 used in the past as it relates to his views on different races or national origins in
- 12 America? If so please explain.
- 13 11. What are your views of white supremacy or white supremacists in American today?
- 14 12. Do you feel white supremacy or white supremacists views are on the rise in
- 15 American? If so please explain.
- 16 13. Do you agree with any of the views of white supremacists in America today? If so
- 17 please explain.
- 18 14. For example do you agree with the main view of white supremacists that whites or
- 19 Caucasians are superior to non-whites? If so please explain.
- 20 15. Are you of the opinion that employers have a duty or obligation to insure that white
- 21 supremacists or other discriminatory views are not voiced at their workplace or are
- 22 you of the opinion that that is something the employee just has to deal with? Please
- 23 explain your view as needed.
- 24 16. Are you of the view whites or Caucasians are treated worse than non-whites in
- 25 America today? If so please explain.
- 26 17. Are you of the opinion that the laws in America favor non-whites over whites or
- 27 Caucasians? If so please explain.
- 28

- 1 18. Do you think there is a problem with discrimination in America today? If so please
2 explain.
- 3 19. In general are you in favor of discrimination laws to combat discrimination in
4 America? If so please explain.
- 5 20. Are you in favor of discrimination laws to combat discrimination in the workplace?
6 If so please explain.
- 7 21. Do you feel that you have ever been subjected to discrimination in the workplace?
8 If so please explain.
- 9 22. Do you feel that you have ever been subjected to a hostile work environment in any
10 job you have held in the past? If so please explain.
- 11 23. Do you feel that you have ever been subjected to retaliation in the workplace? If so
12 please explain.
- 13 24. What are your views about compensating an employee with non-economic
14 damages for emotional distress, mental anguish, etc. for discrimination they have
15 suffered in the workplace?
- 16 25. What are your views about compensating an employee with punitive damages to
17 punish their employer/former employer for malicious and wrongful conduct they
18 have suffered in the workplace?
19

20 DATED: 3/21/2023

LAW OFFICES OF MICHAEL P. BALABAN

21
22 BY: /s/ Michael P. Balaban

23 Michael P. Balaban, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that pursuant to FRCP Rule 5(b)(3) and LR IC 4-1(a), a true and correct copy of the foregoing document was electronically served via the Court's CM/ECF electronic filing system to the following persons on March 21, 2023:

Martin A. Little, Esq.
Robert L. Rosenthal, Esq.
HOWARD & HOWARD ATTORNEYS PLLC
Attorneys for Defendant

/s/ Michael P. Balaban
Michael P. Balaban